

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No. 1:20-CV-1096

SUPRIYA KHAZANIE,

Plaintiff,

v.

UNIVERSITY OF NORTH CAROLINA
AT CHAPEL HILL and KATIE
THORNSVARD, in her individual
capacity,

Defendants.

JOINT RULE 26(f) REPORT

1. Pursuant to Fed. R. Civ. P. 26(f) and LR 16.1(b), a conference was held on June 8, 2022, between Valerie Bateman, attorney for Plaintiff, and Kari Johnson, attorney for Defendants University of North Carolina at Chapel Hill and Katie Thornsvard.
2. Discovery Plan. The parties propose to the Court the following discovery plan:
 - a. The “commencement date” of discovery will be the date the Court enters a Discovery Scheduling Order.
 - b. The Parties will serve Rule 26(a) Initial Disclosures 30 days after the Court enters its Discovery Scheduling Order.

- c. Discovery will be needed on Plaintiff's claims and Defendants' defenses thereto.
- d. Discovery shall be placed on a case-management track established in LR 26.1. The parties agree that the appropriate plan for this case is Complex. The date for the completion of all discovery (general and expert) is February 24, 2023.
- e. The parties agree that Plaintiff and Defendants (collectively) shall each have a total of ten (10) depositions, including any expert witness(es).
- f. The parties agree that Plaintiff and Defendants (collectively) shall each have thirty-five (35) interrogatories (including subparts) and requests for admission.
- g. Reports required by Rule 26(a)(2)(B) and disclosures required by Rule 26(a)(2)(C) are due during the discovery period: From Plaintiff, by November 29, 2022. From Defendants, by January 17, 2023. Supplementation will be as provided in Rule 26(e) or as otherwise ordered by the court.
- h. Mediation. Mediation should be conducted late in the discovery period, the exact date to be set by the mediator after consultation

with the parties. The parties will confer and file a Designation of Mediator with the Court in a timely manner.

- i. Preliminary Deposition Schedule. Preliminarily, the parties agree to the following schedule for depositions: Depositions may be scheduled and taken during any part of the discovery period. The parties will update this schedule at reasonable intervals.

3. Other items.

- a. Plaintiff should be allowed until September 1, 2022 to request leave to join additional parties or amend pleadings. Defendants should be allowed until October 3, 2022 to request leave to join additional parties or amend pleadings. After these dates, the Court will consider, inter alia, whether the granting of leave would delay trial.
- b. The parties have discussed special procedures for managing this case, including reference of the case to a Magistrate Judge on consent of the parties under 28 U.S.C. §§ 636(c), or appointment of a master. The parties have concluded no such special procedures are necessary at this time.
- c. Trial of the action is expected to take approximately five (5) days. A jury trial has been demanded.

- d. The parties discussed whether this involves the possibility of confidential or sealed documents. At this time, the parties have not identified documents (not already sealed by the Court) which will need to be sealed.
- e. The last day for filing dispositive motions should be March 27, 2023.
- f. The suggested trial date is 45 days after a decision on any dispositive motion or July 10, 2023, whichever is later.
- g. Other. The parties anticipate that confidential information will be exchanged during discovery in this matter. Accordingly, the parties have attached a proposed Consent Protective Order for the Court's consideration. If the proposed Consent Protective Order is acceptable to the Court, the parties respectfully request that the Court enter the order.

Respectfully submitted, this the 14th day of June, 2022.

JOSHUA H. STEIN
Attorney General

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CERTIFICATE OF SERVICE

I do hereby certify that I have on this day electronically filed a copy of the foregoing **JOINT RULE 26(f) REPORT** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered CM/ECF users.

This the 14th day of June, 2022.

/s/ Kari R. Johnson
Kari R. Johnson
Special Deputy Attorney General